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Counsel for TransCanada Keystone Pipeline, LP and TC Energy Corporation

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

INDIGENOUS ENVIRONMENTAL
NETWORK and NORTH COAST RIVERS
ALLIANCE,

Plaintiffs,

vs.

PRESIDENT DONALD J. TRUMP,
UNITED STATES DEPARTMENT OF
STATE; MICHAEL R. POMPEO, in his
official capacity as U.S. Secretary of State;
UNITED STATES ARMY CORPS OF
ENGINEERS; LT. GENERAL TODD T.
SEMONITE, Commanding General and
Chief of Engineers; UNITED STATES FISH
AND WILDLIFE SERVICE, a federal
agency; GREG SHEEHAN, in his official
capacity as Acting Director of the U.S. Fish
and Wildlife Service; UNITED STATES
BUREAU OF LAND MANAGEMENT, and
DAVID BERNHARDT, in his official

CV 19-28-GF-BMM

**DEFENDANTS
TRANSCANADA
KEYSTONE PIPELINE, LP
AND TC ENERGY
CORPORATION
SUPPLEMENTAL STATUS
REPORT**

capacity as Acting U.S. Secretary of the Interior,

Defendants,

TRANSCANADA KEYSTONE PIPELINE, LP, a Delaware limited partnership, and TC ENERGY CORPORATION, a Canadian Public company,

Intervenor-Defendants.

TC Energy submits this response to update the Court on its planned activities regarding the Keystone XL pipeline and to inform the court of its intent to respond in opposition to Plaintiffs' motion for a Temporary Restraining Order (TRO)/Preliminary Injunction (PI).

On January 14, 2020, TC Energy informed the Court and the parties (Doc. 100) that it did not plan to commence construction-related activities until February 2020. TC Energy now represents that none of the activities identified in the January 14 Amended Status Report will take place before February 24, 2020, at the earliest. TC Energy will file a proposed briefing schedule early the week of February 3, 2020 that should provide the Court with ample time to resolve Plaintiffs' motion before February 24, 2020.

DATED this 31st day of January, 2020,

/s/ Peter R. Steenland, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served today via the Court's CM/ECF system on all counsel of record.

/s/ Jeffery J. Oven